

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SCOTT BLAIR,

*Plaintiff,*

v.

ALSTOM TRANSPORTATION, INC. and  
KAWASAKI RAIL CAR, INC.,

*Defendants.*

C.A. No. 1:16-cv-03391-PAE-JLC

**DEFENDANT KAWASAKI RAIL CAR, INC.'S**  
**NOTICE OF APPLICATION FOR COSTS AGAINST PLAINTIFF**

PLEASE TAKE NOTICE that, upon Defendant's Bill of Costs, the Declaration of Sheila Mortazavi dated September 8, 2020, and the exhibits annexed thereto, and all other pleadings and proceedings herein, Defendant will move this Court before the Orders and Judgment Clerk, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, Room 250, New York, NY 10007 on September 25, 2020 at 11:30 A.M. or, as soon thereafter as counsel may be heard, at a time and date to be determined as convenient for the Court, for an order pursuant to Rule 54 of the Federal Rules of Civil Procedure, Local Civil Rule 54.1, and 28 U.S.C. § 1920, granting fees and costs sought by Defendant and granting such other relief that this Court deems proper.

Dated: September 9, 2020

Respectfully submitted,

/s/ Armin Ghiam

Sheila Mortazavi

Zaed M. Billah

Armin Ghiam

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2020, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Armin Ghiam